

# EXHIBIT O

**Safia Anand**

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**From:** Ira S. Sacks  
**Sent:** Tuesday, April 15, 2008 8:15 AM  
**To:** Ronald I. Paltrowitz Esq. (ron.paltrowitz@Bozlaw.com)  
**Cc:** John P. Bostany (john@bozlaw.com)  
**Subject:** Discovery

Ron,

Although I am traveling, there are the following open discovery issues as to which a response is urgently needed:

Since Friday, I have told you and John that the full set of Sanei invoices and orders -- not just a sampling -- would be available yesterday (Monday) for inspection and copying or for copying if you want the full set without inspection. I asked you or John to call Safia in my absence.

I need confirmation that you are still planning on taking Mr. Nir on April 18 and in both cases. I have been asking for that since April 3 and 4. It is unfair for you to leave the witness hanging.

With respect to the GMA witnesses, are they on April 23 and 24 or April 23 and 25; which GMA witness will be on which date; and are both designated on all our 30(b)(6) categories?

I also need confirmation that you are taking Saliero (Saks) on April 30 and Singer on May 1.

My best,

Ira

Ira S. Sacks  
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